

**NJID 821116**

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Attorneys for LOANCARE, LLC, AS SERVICER FOR CIT BANK, N.A.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13  
LINCOLN WHITE D/B/A FIRST  
CLASS AUTO REPAIR A/K/A : CASE NO. 18-19773-CMG  
LINCOLN B WHITE  
DORIS WHITE A/K/A DORIS M : **NOTICE OF MOTION FOR**  
WHITE : **RELIEF FROM AUTOMATIC**  
: **STAY PURSUANT TO 11 USC**  
: **SECTION 362(d)**

Debtors

LINCOLN WHITE D/B/A FIRST CLASS  
AUTO REPAIR A/K/A LINCOLN B  
WHITE  
116 HONEYSUCKLE DRIVE  
TRENTON, NJ 08638

KEVIN C. FAYETTE, Esquire  
1675 WHITEHORSE MERCERVILLE  
ROAD  
SUITE 204  
HAMILTON, NJ 08619

DORIS WHITE A/K/A DORIS M  
WHITE  
116 HONEYSUCKLE DRIVE  
TRENTON, NJ 08638

ALBERT RUSSO  
STANDING CHAPTER 13 TRUSTEE  
CN 4853  
TRENTON, NJ 08650-4853

LINCOLN WHITE D/B/A FIRST  
CLASS AUTO REPAIR A/K/A  
LINCOLN B WHITE  
116 HONEYSUCKLE DRIVE  
EWING TOWNSHIP, NJ 08638

U.S. TRUSTEE  
US DEPT OF JUSTICE  
OFFICE OF THE US TRUSTEE  
ONE NEWARK CENTER STE 2100  
NEWARK, NJ 07102

DORIS WHITE A/K/A DORIS M  
WHITE  
116 HONEYSUCKLE DRIVE  
EWING TOWNSHIP, NJ 08638

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)**

LOANCARE, LLC, AS SERVICER FOR CIT BANK, N.A. (hereinafter 'Movant') has filed papers with the Court to have an Order entered granting it relief from the automatic stay against the property commonly known as 116 HONEYSUCKLE DRIVE, EWING TOWNSHIP, NJ 08638.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the Court to grant Movant relief from the automatic stay regarding the above real property, or if you want the Court to consider your views on the Motion, then on or before 05/08/2019 you or your attorney must:

File with the Court a written response to Movant's Motion explaining your position. Your response must be filed with the Bankruptcy Clerk of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

/s/ Nicholas V. Rogers  
Nicholas V. Rogers, Esq.  
Phelan Hallinan Diamond & Jones, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
Tel: 856-813-5500 Ext. 42689  
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NEWARK, NJ 07102

If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on 05/15/2019 at 09:00 AM at the United States Bankruptcy Courthouse, 402 East State Street, Courtroom #3, Trenton, New Jersey 08608, before the Honorable CHRISTINE M. GRAVELLE, presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: April 1, 2019

/s/ Nicholas V. Rogers

Nicholas V. Rogers, Esq.

Phelan Hallinan Diamond & Jones, PC

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Philadelphia, PA 19103

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